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June 9, 1994

VIA FEDERAL EXPRESS

Mr. William F. Caton, Acting Secretary  
Federal Communications Commission  
1919 M. Street, NW, Room 222  
Washington, DC 20554

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RE: Petition for Partial Reconsideration filed in response  
to First Report and Order in ET Docket No. 93-7  
(Compatibility between Cable Systems and  
Consumer Electronics Equipment).

Dear Mr. Caton:

Please find enclosed for filing the Petition for Partial Reconsideration of ANTEC Corporation which is submitted in response to the First Report and Order released May 4, 1994 in the ET Docket No. 93-7. A signed original and ten (10) copies are enclosed so that each Commissioner may receive a personal copy.

Please return one (1) stamped copy to me in the stamped return envelope enclosed.

Thank you.

Sincerely,

EDWARD J. CALLAHAN  
VICE PRESIDENT TECHNOLOGY  
ANTEC CORP.  
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ENGLEWOOD, CO 80111

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

IN THE MATTER OF )

Implementation of Section 17 )  
of the Cable Television )  
Consumer Protection and )  
Competition Act of 1992 )

Compatibility between )  
Cable Systems and Consumer )  
Electronics Equipment )

ET Docket No. 93-7

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PETITION FOR PARTIAL RECONSIDERATION

ANTEC Corporation ("ANTEC"), the second largest manufacturer of basic remote controlled set-top devices for the cable industry, submits this petition for partial reconsideration of certain aspects of the First Report and Order released in the above - referenced proceeding on May 4, 1994.

While ANTEC is in general pleased that the Commission is taking the first steps towards ensuring enhanced compatibility between consumer electronics equipment and cable systems, it is troubled with certain aspects of this instant First Report and Order.

Remote Controls

In Para 62, the Commission adopts, "a requirement that cable operators allow their set-top devices that incorporate remote control capability to be operated with subscriber-owned remote controls or otherwise take no action to prevent the use of such remote controls." Additionally this paragraph allows an exception to operators to disable

remote controlled features of a set-top device if requested by the subscriber. A case in point would be where two separate decoders are co-located one connected to a TV receiver and the other connected to a VCR. In this example, whenever the subscriber attempted to change channels on the TV receiver decoder by use of the remote control, the channels on the VCR decoder would unintentionally change unless the VCR decoder remote controlled functions were disabled.

However in Para. 63, the Commission also includes as a requirement the suggestion of The Consumer Federation of America and the Home Recording Rights Coalition (CFA/HRRC) "that we prohibit cable operators from changing the infrared codes used to operate the remote control capabilities of the set-top devices they employ. This requirement will necessitate that the remote control capabilities of any replacement customer equipment provided to subscribers employ the same infrared codes for remote control that are used with the subscriber's existing set-top equipment. This will avoid the need for subscribers to replace remote control units they own (emphasis added) if the cable operator changes their set-top box. We do not believe this will be a significant burden for cable operators, as they can simply chose replacement equipment that operates with the same infrared codes as their existing equipment. 40" Footnote 40 states: "In quantity orders, cable operators will be able to specify the specific codes to be used in new equipment.")

ANTEC notes that the prohibition against changing IR codes will make it very difficult for operators to change brands of set-top equipment they utilize in their systems. For instance, if an operator is using brand "X" set-top devices in a particular system and

wishes to change to Brand "Y" units, then the Brand "Y" units would be required to respond to the original Brand "X" infrared codes. In some cases cable set-top equipment vendors have intellectual property rights on their IR codes and would most likely require a license fee from another vendor wanting to duplicate their codes. This will add cost to the price of the equipment, making it more expensive for the cable operator to purchase.

It is ANTEC's belief that what the Commission intended was to ensure that a subscriber-owned "universal" remote control would still be functional when a new set-top device was installed. Universal remote controls are either of the "learning" type or of the "preprogrammed" type. To program the learning type of remote, the subscriber places it in close proximity to the vendor equipment-specific remote control while the various keys are depressed according to printed instructions provided with the learning remote.

In the case of a preprogrammed remote control, the subscriber simply enters a multidigit code from a list supplied with the universal remote to activate from internal ROM the functions of the vendor equipment-specific remote. This would appear to fulfill the Commission's intent.

Para. 63 concludes with the following statement: "This requirement will not prevent cable operators from using new equipment that includes additional infrared codes for new remote control functions that were not included in existing models of equipment." For instance, if an operator adds new equipment with new features requiring additional infrared codes, he is apparently allowed to supply new remote controls with these additional codes. Assume that the equipment is being replaced because it is obsolete or because the vendor has gone out of business. Does the new equipment still

have to use the IR codes of the obsolete equipment ? This is not an efficient manner in which to introduce new technology to the cable industry.

ANTEC therefore requests that the Commission reconsider its decision to require cable operators to adhere to the requirements of Paragraph 63 of its Report and Order regarding compatibility between cable systems and consumer electronics equipment.

Conclusion

For the foregoing reasons, ANTEC respectfully requests that the Commission reconsider its Report and Order as discussed above.

Respectfully submitted  
ANTEC CORPORATION

A handwritten signature in cursive script, reading "Edward J. Callahan".

EDWARD J. CALLAHAN  
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